

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

JOSEPH MARTIN AND  
LAURA MARTIN,  
Plaintiffs,

v.

NATIONAL CREDIT SYSTEMS, INC.,  
  
Defendant.

Case No.: 1:18-cv-1-HSO-JCG  
Hon. Judge Halil S. Ozerden  
Magistrate Judge John C. Gargiulo

**ADDENDUM TO APPLICATION FOR ADMISSION PRO HAC VICE  
CHARITY A. OLSON**

Eckstein v Credit Control Services, Inc.  
USDC – ND California (Case No: 4:17-cv-02916)

On October 12, 2017, the Applicant and her co-lead counsel, Brett Goodman, were sanctioned one hundred twenty five dollars (\$125) each because an attorney from Mr. Goodman's office not designated as "lead counsel" appeared in the place of Applicant and Mr. Goodman for an initial case management conference. Applicant could not attend the conference in California because she was in a jury trial in Michigan that unexpectedly lasted five (5) days. Supporting documentation is attached hereto.

Respectfully Submitted,

/s/ Charity A. Olson  
Charity A. Olson (P68295)  
**BROCK & SCOTT, PLLC**  
2723 S. State St., Ste. 150  
Ann Arbor, MI 48104  
(734) 222-5179  
[charity.olson@brockandscott.com](mailto:charity.olson@brockandscott.com)

Dated: March 15, 2018

**EXHIBIT A**

**ORDER TO SHOW CAUSE**

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

DOUG ECKSTEIN,  
Plaintiff,

v.

CREDIT CONTROL SERVICES, INC.,  
Defendant.

Case No. 17-cv-02916-JSW

**ORDER TO SHOW CAUSE**

United States District Court  
Northern District of California

By order dated July 25, 2017, this Court set the case management conference for August 25, 2017. (Dkt. No. 16.) On August 18, 2017, the Court granted the parties' stipulation continuing the case management conference to September 29, 2017 on the ground that Defendant's counsel was scheduled to appear at a hearing in the Southern District of Indiana on the date scheduled for the case management conference.

In granting the stipulation, the Court admonished counsel that their request to continue the case management conference was untimely and that counsel had, therefore, failed to comply with the Court's order scheduling the case management conference. The Court's order warned:

The Court expects its orders to be followed. The parties are admonished that this is their one, and only, warning. Future non-compliance with the Court's orders will result in the imposition of sanctions.

(Dkt. no. 18, at 2.) Unfortunately, it does not appear the message was received.

The order setting the initial case management conference in this action stated: "The parties shall appear *in person through lead counsel* to discuss all items referred to in this Order and with authority to enter stipulations, to make admissions and to agree to further scheduling dates." (Dkt. No. 16, at 1 (emphasis added).) At the September 29, 2017 case management conference,

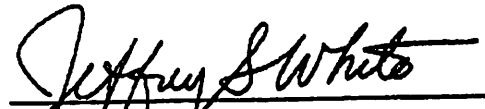
Case 4:17-cv-02916-JSW Document 27 Filed 10/03/17 Page 2 of 2

1 however, neither of Defendant's counsel of record — Brett B. Goodman, Esq. and Charity A.  
2 Olson, Esq. — appeared. Instead, Defendant was represented by Sheri Guerami, Esq., who  
3 informed the Court that she was not lead counsel for Defendant.

4 Accordingly, Defendant's counsel are HEREBY ORDERED TO SHOW CAUSE in  
5 writing as to why the Court should not impose sanctions in the amount of \$250.00 to either Brett  
6 B. Goodman, Esq. and Charity A. Olson, Esq. Counsel's response to this Order to Show Cause  
7 shall be due by October 10, 2017. Counsel's response shall indicate which attorney is Defendant's  
8 lead counsel.

9 **IT IS SO ORDERED.**

10 Dated: October 3, 2017

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12 **JEFFREY S. WHITE**  
13 United States District Judge  
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## **EXHIBIT B**

### **RESPONSE TO ORDER TO SHOW CAUSE**

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**YU | MOHANDESI LLP**

**Brett B. Goodman** (SBN 260899)  
213.375.3543 | bgoodman@yumollp.com  
**Sheri Guerami** (SBN 265231)  
213.418.9340 | sguerami@yumollp.com  
633 West Fifth Street, Suite 2800  
Los Angeles, CA 90071  
213.377.5501 Facsimile

Attorneys for Defendant  
Credit Control Services, Inc.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

**DOUG ECKSTEIN,**

Plaintiff,

vs.

**CREDIT CONTROL SERVICES, INC.  
D/B/A CREDIT COLLECTION  
SERVICES**

Defendants.

Case No.: 4:17-cv-02916-JSW

**RESPONSE TO ORDER TO SHOW  
CAUSE**

Compl. Filed: May 22, 2017

YU | MOHANDESI LLP  
633 West Fifth Street, Suite 2800  
Los Angeles, CA 90071

Case 4:17-cv-02916-JSW Document 28 Filed 10/10/17 Page 2 of 3

1 In response to the Court's Order to Show Cause dated October 3, 2017 [Dkt.  
2 27], Defendant's counsel hereby submits the attached declarations of Charity A. Olson  
3 (Exhibit 1) and Brett B. Goodman (Exhibit 2). Defendant's counsel sincerely  
4 apologizes for their non-appearance at the Scheduling Conference on September 29,  
5 2017.

6  
7 DATED: October 10, 2017.

8 YU MOHANDESI LLP

9  
10 By /s/ Brett B. Goodman  
11 Brett B. Goodman  
12 Attorneys for Defendant  
13 Credit Control Services, Inc.  
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YU | MOHANDESI LLP  
633 West Fifth Street, Suite 2800  
Los Angeles, CA 90071

Case 4:17-cv-02916-JSW Document 28 Filed 10/10/17 Page 3 of 3

**CERTIFICATE OF SERVICE**

I certify that on October 10, 2017, a copy of the foregoing was filed and served electronically in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system as described below. Parties may access this filing through the Court's system.

DATED: October 10, 2017.

YU MOHANDESI LLP

By /s/ Brett B. Goodman  
Brett B. Goodman

YU | MOHANDESI LLP  
633 West Fifth Street, Suite 2800  
Los Angeles, CA 90071



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# **EXHIBIT 1**

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**YU | MOHANDESI LLP**

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Attorneys for Defendant  
Credit Control Services, Inc.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

**DOUG ECKSTEIN,**

Plaintiff,

vs.

**CREDIT CONTROL SERVICES, INC.  
D/B/A CREDIT COLLECTION  
SERVICES**

Defendants.

Case No.: 4:17-cv-02916-JSW

**DECLARATION OF CHARITY A.  
OLSON IN RESPONSE TO ORDER  
TO SHOW CAUSE**

Compl. Filed: May 22, 2017

YU | MOHANDESI LLP  
633 West Fifth Street, Suite 2800  
Los Angeles, CA 90071

**DECLARATION OF CHARITY A. OLSON**

1  
2 1. I, Charity A. Olson, am an active member in good standing of the bar of  
3 Michigan and various federal district courts.

4 2. I am also lead counsel for Defendant, Credit Control Services, Inc. in the  
5 above-entitled action.

6 3. I submit this declaration in response to the Court's Order To Show Cause  
7 [Dkt. 27].

8 4. On August 18, 2017, the Court granted the parties' stipulation continuing  
9 the case management conference to September 29, 2017.

10 5. The continued case management conference date of September 29, 2017  
11 was duly calendared to ensure compliance with the Court's order.

12 6. On Monday, September 25, 2017, I started a jury trial in the United  
13 States District Court for the Eastern District of Michigan.

14 7. Based on the subject matter of the lawsuit (Fair Debt Collection Practices  
15 Act, 15 U.S.C. § 1692 *et seq.*), the parties' pre-trial submissions and my past  
16 experience handling similar FDCPA trials, I believed in good faith that the trial would  
17 only last 2-3 days, thereby, permitting my appearance.

18 8. Unfortunately, due to unforeseen issues related to expert testimony and  
19 other evidentiary issues, the trial lasted through the afternoon of Friday, September  
20 29, 2017, when the jury delivered its verdict. This outcome was not and could not  
21 have been anticipated under the circumstances.

22 9. As the trial progressed, I directed my staff to contact all courts with  
23 pending matters and/or co-counsel, if and as appropriate, to ensure timely  
24 communication of my circumstances and coverage for, or adjournment of, any  
25 appearances, as needed, including the continued case management conference in this  
26 matter.

27 10. Unfortunately, Mr. Goodman had a mediation with JAMS scheduled for  
28 September 29, 2017, in Orange County, California and could not appear in my place.

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1           11. As a result, Sheri Guerami, an attorney working on this matter, appeared  
2 at the case management conference on my behalf.

3           12. Given the earlier adjournment, the Court's denial of Plaintiff's request to  
4 appear by telephone and the unusual circumstances surrounding my inability to  
5 personally appear at the conference, it was my understanding and belief that Ms.  
6 Guerami, who had full knowledge of this matter and full authority to enter into  
7 stipulations, make admissions, and agree to further scheduling dates, could appear at  
8 the conference to ensure continued progression of this matter.

9           13. My understanding was plainly incorrect and I sincerely apologize for any  
10 inconvenience I caused to the Court or to Plaintiff's counsel by my non-appearance at  
11 the Scheduling Conference.

12           14. Based on the foregoing, I respectfully request that the court not impose  
13 sanctions in the amount of \$250.00.

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15           I declare under penalty of perjury under the laws of the United States that the  
16 foregoing is true and correct.

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18           Executed on October 10, 2017, in Ann Arbor, Michigan

19  
20                               /s/ Charity A. Olson  
21                               Charity A. Olson

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**CERTIFICATE OF SERVICE**

I certify that on October 10, 2017, a copy of the foregoing was filed and served electronically in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system as described below. Parties may access this filing through the Court's system.

DATED: October 10, 2017.

YU MOHANDESI LLP

By /s/ Brett B. Goodman  
Brett B. Goodman

YU | MOHANDESI LLP  
633 West Fifth Street, Suite 2800  
Los Angeles, CA 90071

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## **EXHIBIT 2**

Case 4:17-cv-02916-JSW Document 28-2 Filed 10/10/17 Page 2 of 4

1 **YU | MOHANDESI LLP**

2 **Brett B. Goodman (SBN 260899)**  
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3 **Sheri Guerami (SBN 265231)**  
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4 633 West Fifth Street, Suite 2800  
Los Angeles, CA 90071  
5 213.377.5501 Facsimile

6 Attorneys for Defendant  
Credit Control Services, Inc.  
7

8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10

11 **DOUG ECKSTEIN,**

12 **Plaintiff,**

13 **vs.**

14 **CREDIT CONTROL SERVICES, INC.**  
15 **D/B/A CREDIT COLLECTION**  
**SERVICES**

16 **Defendants.**  
17

Case No.: 4:17-cv-02916-JSW

**DECLARATION OF BRETT B.**  
**GOODMAN IN RESPONSE TO**  
**ORDER TO SHOW CAUSE**

Compl. Filed: May 22, 2017

YU | MOHANDESI LLP  
633 West Fifth Street, Suite 2800  
Los Angeles, CA 90071

**DECLARATION OF BRETT B. GOODMAN**

I, Brett B. Goodman, declare:

1. I am an attorney at Yu | Mohandesi LLP, and co-lead counsel for Defendant Credit Control Services, Inc. in the above-entitled action.

2. I submit this declaration in response to the Court's Order To Show Cause. [Dkt. 27].

3. Charity Olson was initially scheduled to attend the Scheduling Conference set for September 29, 2017. However, due to unforeseen circumstances, as set forth further in Ms. Olson's concurrently filed declaration, Ms. Olson was not able to appear at the Scheduling Conference as intended.

4. I was also unable to appear at the Scheduling Conference set for September 29, 2017, because I had a previously scheduled mediation with JAMS on September 29, 2017, at 10:00 a.m., in Orange County, California, with the Honorable David H. Brickner (Ret.).

5. It was my mistaken belief that Sheri Guerami, an attorney working on this case, could appear at the case management conference on my behalf. Ms. Guerami had full authority to enter stipulations, make admissions, and agree to further scheduling dates.

6. I apologize for any inconvenience I caused to the Court or to Plaintiff's counsel by my non-appearance at the Scheduling Conference.

7. Based on the foregoing, I respectfully request that the court not impose sanctions in the amount of \$250.00.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on October 10, 2017, in San Diego, California.

/s/ Brett B. Goodman  
Brett B. Goodman



Case 4:17-cv-02916-JSW Document 28-2 Filed 10/10/17 Page 4 of 4

**CERTIFICATE OF SERVICE**

I certify that on October 10, 2017, a copy of the foregoing was filed and served electronically in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system as described below. Parties may access this filing through the Court's system.

DATED: October 10, 2017.

YU MOHANDESI LLP

By /s/ Brett B. Goodman  
Brett B. Goodman

YU MOHANDESI LLP  
633 West Fifth Street, Suite 2800  
Los Angeles, CA 90071

**EXHIBIT C**

**ORDER IMPOSING  
SANCTIONS**

Case 4:17-cv-02916-JSW Document 29 Filed 10/12/17 Page 1 of 2

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

DOUG ECKSTEIN,

Plaintiff,

v.

CREDIT CONTROL SERVICES, INC.,

Defendant.

Case No. 17-cv-02916-JSW

**ORDER IMPOSING SANCTIONS**

On October 3, 2017, the Court issued an order to show cause why Defendant's lead counsel—Brett B. Goodman, Esq. and Charity A. Olson, Esq.—should not be sanctioned \$250.00 due to their failure to attend the initial case management conference in this matter. The Court has reviewed the response filed by Mr. Goodman and Ms. Olson.

The Court finds counsels' response unacceptable. As the Court noted in the order to show cause, the Court previously admonished counsel of the need to comply with the Court's orders and warned that future noncompliance would result in imposition of sanctions. Additionally, counsel's scheduling issues do not justify counsel's noncompliance. To the extent counsel was unable to appear because of a jury trial going longer than expected—a not uncommon occurrence—counsel's recourse was to file a request to either continue the case management conference which explains the need for a continuance (and the reason the request was filed within 10 days of the conference) or to appear by telephone. Engaging in self-help and unilaterally opting to not comply with a Court order is never the correct course of action.

Accordingly, there Court HEREBY IMPOSES sanctions in the amount of \$250.00, with \$125.00 payable by Mr. Goodman and \$125.00 payable by Ms. Olson. Mr. Goodman and Ms. Olson shall pay this amount to the Clerk of the Court by no later than Friday, October 20, 2017,

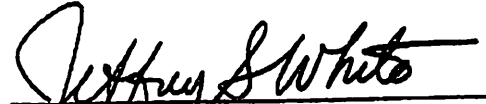
United States District Court  
Northern District of California

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1 and they shall not pass the amount of the sanctions on to their client.

2 **IT IS SO ORDERED.**

3 Dated: October 11, 2017

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5 **JEFFREY S. WHITE**  
6 United States District Judge

**EXHIBIT D**

**PAYMENT RECEIPT**

Case 4:17-cv-02916-JSW Document 33 Filed 10/18/17 Page 1 of 1

Court Name: U.S. District Court, NDCA  
Division: 4  
Receipt Number: 44611814734  
Cashier ID: lovring  
Transaction Date: 10/18/2017  
Payer Name: Olson Law Group

**SECTIONS/CONTEMPT FINES**  
For: Charity A. Olson  
Case/Party: D-CAN-4-17-CV-002916-001  
Amount: \$125.00

**PAPER CHECK CONVERSION**  
Check/Money Order Num: 7778  
Amt Tendered: \$125.00

Total Due: \$125.00  
Total Tendered: \$125.00  
Change Amt: \$0.00

JSW

Checks and drafts are accepted  
subject to collections and full  
credit will only be given when the  
check or draft has been accepted by  
the financial institution on which  
it was drawn.